

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
:   
Retrieval-Masters Creditors Bureau, Inc.,<sup>1</sup> : Case No. 19-23185 (RDD)  
:   
Debtor. :  
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**STIPULATION AND ORDER RESOLVING  
ADMINISTRATIVE EXPENSE CLAIM OF  
EXPERTSOURCE GLOBAL SERVICES PVT. LTD. AND  
AUTHORIZING REJECTION OF RELATED AGREEMENT**

This *Stipulation and Order Resolving Administrative Expense Claim of ExpertSource Global Services Pvt. Ltd. And Authorizing Rejection of Related Agreement* (this “Stipulation”) is entered into by and between Retrieval-Masters Creditors Bureau, Inc. (the “Debtor”) and ExpertSource Global Services Pvt. Ltd. (“ExpertSource” and, together with the Debtor, the “Parties”), by their undersigned counsel, with reference to the following facts:

**R E C I T A L S**

- A. The Debtor filed its chapter 11 case on June 17, 2019 (the “Petition Date”).
- B. Prior to the Petition Date, and for some period thereafter, ExpertSource provided offshore call center services to the Debtor pursuant to a series of formal and informal agreements between the Parties, beginning with a certain Master Services Agreement, dated November 11, 2014 (as may have been amended, supplemented, or superseded, the “Agreement”).
- C. ExpertSource has filed two proofs of claim in the Debtor’s case, asserting prepetition, unsecured claims [Claim Nos. 19 and 33] (the “Prepetition Claims”).

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number is 9495. As of November 1, 2019, the Debtor’s service address for purposes of this chapter 11 case is 200 Pemberwick Road, Greenwich, CT 06831. The Debtor also has done business as American Medical Collection Agency.

D. In addition, on November 25, 2019, ExpertSource filed what it designated a *Notice of Hearing on Motion for Administrative Claim 11 U.S.C § 503* [Doc. No. 208] with an attached “Application for Administrative Claim” (collectively, the “Motion”), which seeks immediate payment of \$11,250 on account of services performed subsequent to the Petition Date (the “Administrative Claim”).

E. The Debtor contests the amount of the Administrative Claim. In addition, the Debtor believes that the Motion is procedurally improper.

F. The Parties have agreed to resolve the Administrative Claim, the Motion, and to confirm the rejection of the Agreement, pursuant to this Stipulation.

### **A G R E E M E N T**

**NOW, THEREFORE**, in consideration of the foregoing, the Parties hereby stipulate and agree as follows:

1. Upon approval of this Stipulation, the Agreement shall be deemed rejected by the Debtor as of the Petition Date.

2. Within one week after the Stipulation is “so ordered” by the Court and entered on the docket, the Debtor shall pay to ExpertSource eight thousand dollars (US \$8,000.00) in full and final satisfaction of the Administrative Claim, and of any and all claims against or related to the Debtor arising on or after the Petition Date.

3. The Administrative Claim shall be expunged from the claims register maintained in the Debtor’s case. For the avoidance of doubt, this Stipulation shall not affect the rights of ExpertSource or any person with respect to the Prepetition Claims.

4. This Stipulation shall not be binding upon either of the Parties unless and until it is “so ordered” by the Court.

5. The Court shall retain jurisdiction with respect to the interpretation, implementation, and enforcement of this Stipulation.

Dated: December 11, 2019

**CHAPMAN AND CUTLER LLP**

/s/Steven Wilamowsky  
Steven Wilamowsky, Esq.  
1270 Avenue of the Americas  
New York, NY 10022  
Telephone: 212.655.6000  
Email: wilamowsky@chapman.com

and

Aaron M. Krieger  
111 West Monroe Street  
Chicago, IL 60603-4080  
Telephone: 312.845.3000  
Email: akrieger@chapman.com

*Attorneys for Debtor and Debtor in Possession*

**EXPERTSOURCE GLOBAL SERVICES PVT. LTD.**

/s/Anil Wadhwa  
By: Mr. Anil Wadhwa  
As: *Chief Executive Officer*

**SO ORDERED, there being no objections to the Debtor's duly noticed motion, dated December 16, 2019 for approval hereof:**

Dated: January 2, 2020  
White Plains, NY

/s/ Robert D. Drain  
The Honorable Robert D. Drain  
United States Bankruptcy Judge